

**VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY
LYNCHBURG SATELLITE OFFICE**

**FACT SHEET
FOR PROPOSED PERMITTING ACTION
UNDER 9 VAC 5 Chapter 80 Article 1 (TITLE V-CLEAN AIR ACT)**

APPLICANT:

VA-30872 AIRS Id. No.: 510250027
Brick & Tile Corporation of Lawrenceville
1244 Brickyard Street
Lawrenceville, VA 23868

FACILITY LOCATION:

16024 Governor Harrison Parkway, Brunswick County
UTM Coordinates are ZONE: 18 EASTING: 251.3 km NORTHING: 4073.4 km

FACILITY DESCRIPTION:

Brick & Tile is a manufacturer of face brick, pavers, and various brick shapes covered by Standard Industrial Classification (SIC) Code 3251. The facility has the potential to operate twenty-four (24) hours per day, seven (7) days per week, fifty-two (52) weeks per year. The facility manufactures brick from a combination of clay and shale material that are mined and stockpiled at a remote site. The facility is permitted to manufacture 130,000 tons of brick per year.

EMISSIONS SUMMARY:

PLANTWIDE EMISSIONS SUMMARY [TONS PER YEAR]		
CRITERIA POLLUTANTS	POTENTIAL EMISSIONS	1996 ACTUAL EMISSIONS
Particulate Matter (PM ₁₀)	58.3	38.3
Nitrogen Oxides (NO _x)	35.8	24.1
Sulfur Dioxide (SO ₂)	43.6	14.0
Carbon Monoxide (CO)	78	52.7
Volatile Organic Compounds (VOC)	1.6	1.1

PLANTWIDE EMISSIONS SUMMARY [TONS PER YEAR] (Cont'd)		
HAZARDOUS AIR POLLUTANTS	POTENTIAL EMISSIONS	1996 ACTUAL EMISSIONS
Hydrogen Fluoride	26.7	16.2
Hydrogen Chloride	11.1	2.5

TITLE V PROGRAM APPLICABILITY BASIS:

This facility has the potential to emit 26.7 tons per year of Hydrogen Fluoride and 11.1 tons per year of Hydrogen Chloride. Due to this facility's potential to emit over 10 tons per year of a HAP, Brick & Tile Corporation of Lawrenceville is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 9 VAC 5 Chapter 80 Article 1.

LEGAL AND FACTUAL BASIS FOR DRAFT PERMIT CONDITIONS:

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the Commonwealth of Virginia Federal Operating Permit Regulations for the purposes of Title V of the Federal Clean Air Act (9 VAC 5 Chapter 80 Article 1), and underlying applicable requirements in other state and federal rules. Applicable requirement means all of the following as they apply to emission units in a Title V source:

- a. Any standard or other requirement provided for in the State Implementation Plan or the Federal Implementation Plan, including any source-specific provisions such as consent agreements or orders.
- b. Any term or condition of any preconstruction permit issued pursuant to 9 VAC 5-80-10, Article 8 (9 VAC 5-80-1700 et seq.) of this part or 9 VAC 5-80-30 or of any operating permit issued pursuant to 9 VAC 5-80-40, except for terms or conditions derived from applicable state requirements or from any requirement of these regulations not included in the definition of applicable requirement.
- c. Any standard or other requirement prescribed under these regulations, particularly the provisions of 9 VAC 5 Chapter 40 (9 VAC 5-40-10 et seq.), 9 VAC 5 Chapter 50 (9 VAC 5-50-10 et seq.) or 9 VAC 5 Chapter 60 (9 VAC 5-60-10 et seq.), adopted pursuant to requirements of the federal Clean Air Act or under § 111, 112 or 129 of the federal Clean Air Act.
- d. Any requirement concerning accident prevention under § 112(r)(7) of the federal Clean Air Act.

- e. Any compliance monitoring requirements established pursuant to either § 504(b) or § 114(a)(3) of the federal Clean Air Act or these regulations.
- f. Any standard or other requirement for consumer and commercial products under § 183(e) of the federal Clean Air Act.
- g. Any standard or other requirement for tank vessels under § 183(f) of the federal Clean Air Act.
- h. Any standard or other requirement in 40 CFR Part 55 to control air pollution from outer continental shelf sources.
- I. Any standard or other requirement of the regulations promulgated to protect stratospheric ozone under Title VI of the federal Clean Air Act, unless the administrator has determined that such requirements need not be contained in a permit issued under this article.
- j. With regard to temporary sources subject to 9 VAC 5-80-130, (i) any ambient air quality standard, except applicable state requirements, and (ii) requirements regarding increments or visibility as provided in Article 8 (9 VAC 5-80-1700 et seq.) of this part.
- k. Any standard or other requirement of the acid deposition control program under Title IV of the Clean Air Act or the regulations promulgated thereunder.
- l. Any standard or other requirement governing solid waste incineration under §129 of the Clean Air Act.

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 9 VAC 5 Chapter 80 Article 1 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the state but is not federally-enforceable is identified in the draft Title V permit as such.

This facility has been found to be subject to the requirements set forth in items “a, b, and c” above, specifically including the following applicable regulations:

Federal and State:

9 VAC 5-20-180	Facility control equipment maintenance and malfunction
9 VAC 5-50-20	Compliance

9 VAC 5-50-50	Notification, records, and reporting
9 VAC 5-50-260	Best available control technology (BACT)
9 VAC 5-80-80 E	Applications
9 VAC 5-80-110 F	Recordkeeping and reporting
9 VAC 5-80-110 G	Enforcement
9 VAC 5-80-110 H	Permit fees
9 VAC 5-80-110 I	Emissions trading
9 VAC 5-80-110 K.1	Compliance
9 VAC 5-80-110 L	Reopening
9 VAC 5-80-140	Permit shield
9 VAC 5-80-150 E	Maintain permit on premises
9 VAC 5-80-160	Transfer of permits
9 VAC 5-80-170 B	Timely and complete permit renewal
9 VAC 5-80-250	Malfunction
9 VAC 5-80-260	Enforcement
9 VAC 5-170-30	Applicability of General Provisions

40 CFR Part 60 Subpart OOO Standards of Performance for Nonmetallic Mineral Processing Plants

PERIODIC MONITORING:

Opacity Periodic Monitoring for Brick & Tile fabric filters and kiln

Visual emission checks from each fabric filter exhaust stack and the kiln exhaust stack shall be conducted daily. When the source is operating, there are normally no visible emissions. If visible emissions are observed, the record shall include the cause of the emissions and the corrective action taken. Records shall

be maintained, on site, stating the date and time of each visible emissions check and whether visible emissions were observed. Visible emissions checks are not required during start-ups, shut-downs, and malfunctions.

The above opacity monitoring should serve as adequate periodic monitoring for PM and PM₁₀.

Periodic monitoring for the HCl and HF emissions is not included in the permit, since HCl and HF are included for inventory purposes only. It is anticipated that the Brick Manufacturing MACT will contain requirements for these pollutants and then Brick & Tile will be required to comply with the MACT requirements.

The SO₂ limits are included for inventory purposes only. The existing source limits on SO₂ emissions are 2000 ppm by volume (9 VAC 5-40-280) for non-combustion processes. This would equate to greater than 1000 tons per year of SO₂ emissions from the kiln based on exhaust gas air flow. It would be impossible for Brick & Tile to exceed the 2000 ppm for SO₂ in this case.

The NO_x, VOC, and CO emissions are for inventory purposes only and are from the combustion of the natural gas. With a limit on brick production and combustion of natural gas fuel it is very unlikely that there will be a violation of any NO_x, VOC, or CO emissions standard.

REQUEST FOR VARIANCES OR ALTERNATIVES:

None

COMMENT PERIOD:

The public notice appeared in the Brunswick Times-Gazette on July 22, 1998.

Beginning Date: July 22, 1998

Ending Date: August 21, 1998

All written comments should be addressed to the following individual and office:

Keith Sandifer
Senior Environmental Engineer
Department of Environmental Quality
Lynchburg Satellite Office
7705 Timberlake Road
Lynchburg, VA 24502

PROCEDURE FOR REQUESTING PUBLIC HEARING:

During the public comment period any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Director shall grant such a request for a hearing if he concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Department of Environmental Quality
Lynchburg Satellite Office
7705 Timberlake Road
Lynchburg, VA 24502
Phone: (804) 582-5120 Fax: (804) 582-5125